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February 13, 2015

Via ECF

Hon. P. Kevin Castel
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Ramones v. MDDCAR-Chimichuri
14-cv-02577 (PKC)
MLLG File No: 118-14

Dear Judge Castel:

This firm represents the Defendants in the above-referenced matter. This letter shall serve as Defendants' request for an adjournment of the conference scheduled for February 20, 2015 at 11 a.m. until after the settlement conference has been held on February 24, 2015. Defendants also make the instant request since I will be out of the office on a previously scheduled family vacation. Defendants have not previously requested the instant relief, but this conference was rescheduled from January 5, 2015 since fact discovery was extended through January 23, 2015. Plaintiffs consent to this adjournment.

Additionally, Defendants respectfully request additional time to complete expert discovery in the event that this matter is not settled at the February 24, 2015 conference. During their depositions conducted in late January, Plaintiffs testified that the signatures contained on documents which Defendants produced were not their handwriting. Thus, Defendants are in the process of retaining a handwriting expert on this newly raised issue and require the additional time so that he may issue his findings and be deposed.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Joseph M. Labuda, Esq.

cc: Denise Schulman (via ECF)
client (via e-mail)